

March 7, 2007

RESPONSE TO COMMENTS
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY COMMENTS
FEBRUARY 27, 2007
DRAFT PROPOSED PLAN FOR SITE 17
NAVAL STATION GREAT LAKES

- 1) **About This Document Section** – The public comment period date range will need to be revised based upon when the plan is actually made available. This revision will need to occur throughout the document.

Response: *The public comment period date range will be changed to May 1 to 31, 2007 to allow additional time for Navy and regulatory review.*

- 2) **About This Document Section** – Suggest adding the word “final” in the last sentence of the first paragraph just prior to the word “remedy.”

Response: *The sentence will be changed according to the comment.*

- 3) **Page 3, 2nd Paragraph** – The first sentence does not appear to be complete. As written, it does not make sense. Please revise as necessary.

Response: *The sentence will be revised by adding “were conducted” (Early investigations of Pettibone Creek and Boat Basin were conducted in the 1970s.....).*

- 4) **Summary of Site Risks Section** – The estimated cancer and non-cancer risks associated with the exposure pathways should be provided along with the chemicals of concern.

Response: *The estimated cancer and non-cancer risks will be added to the next to last paragraph of this section as the next to last sentence (after the COCs are listed). The following underlined sentence will be added “...COCs for human health in Boat Basin sediment. The noncarcinogenic risk was estimated to be 6.6 (greater than the regulatory goal of unity [1.0]) and the carcinogenic risk was estimated to be 1.8×10^{-4} (exceeding the regulatory goal of 1×10^{-6}). The State of Illinois....”.*

- 5) **Why is Cleanup Needed? Section** – Suggest rewording the last sentence to read as follows: It is the judgment of the Navy and Illinois EPA that the preferred alternative identified in this Proposed Plan, or one of the other active measures considered in the Proposed Plan, is necessary to protect the public health and welfare and the environment from actual or potential releases of hazardous substances into the environment.

Response: *The sentence will be changed with the following minor revision as follows: “It is the judgment of the Navy and Illinois EPA that the preferred alternative identified in this Proposed Plan, or one of the other cleanup alternatives considered in the Proposed Plan, is necessary to protect the public health and welfare and the environment from actual or potential releases of hazardous substances into the environment.”*

- 6) **A Closer Look at the Proposed Cleanup Plan Section** – There should be a concluding summary statement at the end of this section similar to:

“Based on the information currently available, the Navy believes the Preferred Alternative meets the threshold criteria and provides the best balance of tradeoffs among

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the other alternatives with respect to the balancing and modifying criteria. The Navy expects the Preferred Alternative to satisfy the following statutory requirements of CERCLA §121(b): 1) be protective of human health and the environment; 2) comply with ARARs; 3) be cost-effective; 4) utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable; and 5) satisfy the preference for treatment as a principal element."

Response: *The concluding summary statement above will be added to this section. The statement will be revised slightly to say "the Navy and Illinois EPA".*

- 7) **Table 1** – Under Alternative 4, the timeframe to attain the RAOs is listed as "within 5 years." A more specific evaluation should be presented. An estimated amount of time to conduct the removals, dewater the sediments, and dispose of the contaminated sediment should be provided. It is understood that this is merely an estimate and may vary a great deal based upon funding, but within 5 years is too vague for a Proposed Plan. The feasibility study stated that the RAOs would be achieved almost immediately and the PRGs would be attained within 1 year.

Response: *The timeframe will be changed to "less than 1 year."*

Also, the State Acceptance row will be changed to "Illinois EPA concurs with the selection of Alternative 4 as the preferred alternative."

- 8) **Page 7** – The second section should be titled "Why Does the Navy Recommend this Proposed Alternative?"

Response: *The section title will be changed according to the comment.*

- 9) **Page 8** – The second sentence in the last paragraph on the page should read, "You can use the form below to send written comments or to request a formal public meeting be held."

Response: *The sentence will be changed according to the comment.*

- 10) **General Comment** – Although it is implied, there should be a clear statement provided that the preferred alternative can change in response to public comments or based upon receipt of new information.

Response: *The following sentence will be added at the end of the section Why Does the Navy Recommend this Proposed Plan (now Alternative) after the last bullet "This recommended alternative can change in response to the public comments or based upon receipt of new information."*